

**KARYN ANN SHEALY ATTORNEY AFFIRMATION:**  
**ATTORNEY OF RECORD FOR J.G.O.**

I, Karyn Ann Shealy, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am a staff attorney of the New York Immigrant Family Unity Project at The Legal Aid Society, located at 49 Thomas Street, Fifth Floor, New York, New York 10013. I admitted to the New York State Bar, license number 6161160, and the Massachusetts State Bar, license number 703929. I began representation of J.G.O. on February 24, 2025. Through the course of my representation of J.G.O. has stated the below.
2. My client J.G.O. has relayed to me that he was transferred recently from El Valle Detention Center in Raymondville, Texas to Orange County Jail in Goshen, New York, arriving to Orange County Jail on Saturday, April 5, 2025.
3. J.G.O. was born in Venezuela in 1992. Prior to being detained, he was living in New York, New York.
4. J.G.O.'s only entry into the United States was on or about September 29, 2022, through El Paso, Texas. J.G.O. filed an I-589 Application for Asylum and for Withholding of Removal with U.S. Citizenship and Immigration Services on September 18, 2023.
5. J.G.O. fled to the United States because he feared being beaten, tortured, imprisoned, and murdered by the Venezuelan police and Venezuelan military on account of his political opinion. He was active in protesting against the Maduro government. Although he protested peacefully, the Venezuelan Police and/or the Venezuelan National Guard would spray tear gas, chase, beat, detain, and torture protesters. The government and military had records and camera footage of protestors, and J.G.O. knew that he could be identified as he had publicly participated in many protests. J.G.O. knew that eventually he would be targeted and disappeared and decided to flee Venezuela.
6. On January 30, 2025, J.G.O. was at home when ICE officers detained him and transported him to Orange County Jail in Goshen, New York. J.G.O. was placed in removal proceedings at the Varick Street Immigration Court in New York, New York on February 4, 2025. On or about March 1, 2025, J.G.O. was transported from Orange County Jail to Moshannon Valley Processing Center.
7. Around the beginning of March 2025, while J.G.O. was detained by ICE at the Orange County Correctional Facility in Goshen, New York, the risk designation on his identification badge was changed from low to medium high. J.G.O. asked an officer why his designation had been changed, and he was told that ICE must have seen something in his file.
8. The officer asked J.G.O. if he had been part of a gang. J.G.O. vehemently denied any affiliation with a gang, past or present. J.G.O. was confused about why he was being

questioned about gang affiliation and asked to speak with an ICE officer. J.G.O. was told that he had to wait until the ICE officer was available in three days. J.G.O. has consistently stated to this affiant that he has never had any connection or affiliation with any gangs.

9. On March 12, 2025, an officer at EDVF asked J.G.O. to sign a paper in English, which he cannot speak or read fluently. J.G.O. asked what the paper said and was told that the paper was to acknowledge his prior transfer from Orange County Correctional Facility to EVDF. J.G.O. asked for someone to translate the paper, but the officer said that he was wasting his time and instructed J.G.O. to leave. J.G.O. refused to sign the paper.
10. On March 15, 2025, around 7:30 AM, officers took J.G.O. into a big room with other Venezuelan detainees. Officers told everyone to change into their civilian clothing and receive their personal items. J.G.O. was shackled on his wrists, waist, and ankles and loaded onto a bus. J.G.O. was terrified and believed he was to be taken to another detention facility. However, J.G.O. was driven approximately 40 minutes to an airport.
11. At the airport, a helicopter and media crews took pictures and recorded video of J.G.O. and other Venezuelan detainees. J.G.O. saw officials in uniforms with the lettering of DEA, FBI, and ICE. J.G.O. and the other detainees were taken out of the buses and loaded in groups of 10 onto the airplanes.
12. On the plane, J.G.O. and the other detainees asked the officers where they were being taken. The officers would only say that they didn't know and then laughed. J.G.O. described a scene of panic and fear as he and the other detainees desperately begged for information. The officers refused to speak to the detainees and would only speak amongst themselves in English and laugh.
13. After J.G.O. was on the plane for what seemed like 30 minutes to one hour, an officer got on the plane and called out five names, including J.G.O. The officer told J.G.O. to get off the plane. After J.G.O. got off the plane, one of the five men asked the officer what was going to happen to them. The officer said that the group had just won the lottery and laughed.
14. The officers then loaded J.G.O. and the other four men onto the bus still shackled. The group was transferred to another bus where 8-12 other detainees were seated in shackles. J.G.O. was held shackled on the bus for what seemed like two to three hours. J.G.O. and the other individuals asked and begged officers for food and water. The officers did not provide any water or food but instead drank water themselves in front of them and laughed.
15. One of the other men who had been pulled off the plane was seated in direct sunlight on the bus. The man's nose began to bleed, and the officers yelled at the man to close his nose. However, the man was shackled and could not reach his nose. The officers continued to yell at the man to close his nose and to stop the drama.

16. J.G.O. and the others on the bus returned to El Valle at approximately 8 PM and did not receive any food until around 9 PM.
17. J.G.O. was overcome with emotion many times, including crying uncontrollably and expressing fear of being deported at any moment, while recounting the events of the weekend during our attorney calls on March 17 and 18, 2025. J.G.O. reports that he is experiencing extreme fear, sadness, and anxiety as a result of his attempted removal. He has a poor appetite and struggles to sleep. He sleeps at most two to three hours per night and when he manages to sleep, he experiences nightmares and flashbacks of his attempted removal.
18. J.G.O. and other detainees repeatedly asked officers what was happening and where they were being taken. J.G.O. said he and other detainees begged for information from officers while at El Valle Detention Facility ("El Valle") while on the bus to the airplane, while on the airplane before it took off, while on the bus after being removed from the airplane, and then again when returned to El Valle.
19. Despite repeated requests for information about what was happening and where he was going, at no time on March 15, 2025, or during the days leading to the attempted removals did any officer show or provide J.G.O. with any paperwork explaining the basis for his removal or provide any information on where he was being taken. Officers provided no indication that they were attempting to remove him or any of the other detainees to El Salvador. Officers never provided any notice whatsoever that he was subject to the Alien Enemies Act.
20. Likewise, I have never been informed or notified by ICE, DHS, or officials at any of the facilities that detained J.G.O. about the basis for the attempted deportation. I have never been informed or notified by ICE, DHS, or officials at any of the facilities that held J.G.O., about any allegations that J.G.O. has any affiliation with a gang, past or present. He has no tattoos, a fact that I mention only because it appears from news reports that tattoos were a basis for gang allegations against the men removed that day. DHS has never provided any information that J.G.O. was subject to the Alien Enemies Act.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

\_\_\_\_\_/s/\_\_\_\_\_  
Karyn Ann Shealy, Esq.  
Executed this 8th day of April, 2025